

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES, et al.,

Defendants.

No. 3:18-cv-00017-NKM-JCH

STIPULATION AND [PROPOSED] ORDER

WHEREAS, Plaintiff Brennan Gilmore (“Gilmore”) sued Defendants Michele Hickford (“Hickford”) and Words-N-Ideas, LLC (“WNI”) for defamation in connection with WNI’s publication of “BOMBSHELL: New evidence suggests Charlottesville was a complete SET-UP” (the “WNI Publication”) on August 19, 2017;

WHEREAS, the WNI Publication contained a republication with language pertaining to Gilmore and the August 2017 Unite the Right rally;

WHEREAS, WNI, when it relied upon its source, had no evidence that Gilmore was involved in a set up or in any other way with the August 2017 Unite the Right rally in Charlottesville and the terrorist attack that killed Heather Heyer;

WHEREAS, Hickford and WNI do not contest Gilmore’s allegation of defamation;

WHEREAS, the parties desire to amicably resolve all claims arising out of this action;

WHEREAS, in lieu of damages, Hickford and WNI agree to make a joint charitable donation of two thousand five hundred dollars (\$2,500) to the Legal Aid Justice Center;

WHEREAS, Gilmore, Hickford, and WNI, having entered into a settlement agreement, hereby stipulate to the entry of an order in this action, as follows:

IT IS ORDERED, ADJUDGED, AND DECREED as follows:

1. This Court has jurisdiction over the subject matter of the above action and has personal jurisdiction over the parties for purposes of this action and as set forth in Paragraph 4 below.
2. Hickford admits liability for the claims asserted by Gilmore in this action.
3. WNI admits liability for the claims asserted by Gilmore in this action.
4. As a condition of settlement, Hickford and WNI have agreed to make a joint charitable donation of two thousand five hundred dollars (\$2,500) to the Legal Aid Justice Center.
5. The parties agree that this Court will retain jurisdiction to enforce the terms of the parties' settlement agreement and to enforce and resolve any disputes related thereto, if necessary.
6. This action and all defenses thereto are hereby dismissed with prejudice and without costs, disbursements, or attorneys' fees to any party.

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SO ORDERED this ____ day of _____, 2021.

NORMAN K. MOON
SENIOR UNITED STATES DISTRICT JUDGE